

How do you manage contaminated rags?

Proper management of contaminated rags under RCRA is dependent on the contaminating solvent(s) or materials, application of the solvents and eventual disposition of the rags. Because these common industrial items are not specifically addressed in the regulations, application of RCRA to management of contaminated rags is derived from a complex understanding of several basic definitions and regulatory concepts, including the definition of solid and hazardous waste, recycling/reclamation, spent materials and listed and characteristic wastes.

Used rags that are to be disposed of are a RCRA solid waste by definition. Therefore, used rags contaminated with listed or characteristic hazardous waste solvent(s) will be subject to hazardous waste management requirements when no longer useable. The substantive RCRA regulations require them to be collected in a proper container which is kept closed, labeled, dated and inspected weekly, or managed under satellite accumulation requirements, as applicable, and sent to a proper RCRA facility for disposal. However, if the contaminated rags are to be commercially laundered and reused rather than disposed of, the Department's position is that they are not being managed as a solid waste from the time the facility takes action to send them to the laundry. Therefore, they may be conditionally excluded from RCRA requirements for hazardous waste disposal if they are to be sent off-site to a commercial rag cleaning/laundrying service. Generators are strongly encouraged to have commercial rag laundrying contract service established as demonstration of the basis for this conditional exclusion from regulation.

This concept applies to rags contaminated with solvent(s), oil, paint, or other materials during normal industrial uses of the rags. However, for purposes of this conditional application, there must be **NO** free liquids present in the accumulated rags. Any free liquids must be managed as hazardous waste and the entire rag/solvent mixture may be considered a hazardous waste subject to regulation. The purpose of a rag laundrying service is to return usable rags to the customer, not to manage his hazardous wastes. Generators who fail to adhere to this technically and environmentally sound position of "no free liquids" may be subject to full regulation for waste rags, including possible citation for failure to properly identify and manage hazardous wastes. Generators should also bear in mind that allowing solvents to evaporate from the rags in order to achieve a "no free liquids" state is both inappropriate and in conflict with the regulations. Generators may wish to use some sort of solvent extraction or wringing to recover excess solvent amounts as part of the job task if they plan to have rags laundered. Any recovered liquids should be managed in accordance with the regulations.

When waste rag/solvent mixes are to be discarded (disposed of) rather than laundered, proper assignment of hazardous waste codes depends on the contaminating solvent's use. In the first example, if a product solvent is placed on a rag and used to clean an item, the solvent is considered a commercial chemical product when poured on the rag and does not yet meet the listing definition of a "spent solvent". The resulting rag/solvent waste would be a hazardous waste only if it exhibited a characteristic. If the combination can spontaneously combust or will vigorously support combustion when ignited, the ignitability (D001) characteristic applies. The rag/solvent combination is also very likely to exhibit a toxicity characteristic by TCLP. However, if free liquid is also present it will now meet a "spent solvent" definition and if it contains chemical constituents that are listed the entire resulting mixture will be listed hazardous waste, possibly ignitable or toxicity characteristic as well. In the second example, if a product solvent (which would be listed) is first used and becomes "spent" by direct application to an item, then wiped off with a rag, the rag/solvent will be a listed hazardous waste, regardless of whether any free liquids are present or not. It is defined as such because the used rag now contains "spent solvent" that is listed hazardous waste. Of course, if the used solvent is not listed, the rag/solvent combination must still be evaluated for hazardous waste characteristics. One other possible example of contaminated rag type occurs when a spill of a commercial chemical product meeting a P- or U-listing is wiped up with a rag. In such cases, the contaminated rag should be assigned the corresponding waste code and disposed of at a RCRA facility. Rags or other materials used to clean up P- or U-list waste spills will be considered hazardous waste spill residues and are not suitable for management through laundry services. They are subject to all applicable hazardous waste management regulations.

In recent years, commercial industrial wipes have gained popularity in use. These are usually a paper, cloth, or hybrid product that are saturated with a solvent for specific applications. Because these are unsuitable for reclaim through commercial industrial rag laundry services, it may be presumed that they will be regulated as hazardous waste for accumulation and disposal if it is determined that they are a characteristic or listed hazardous waste. The wipes/solvents may exhibit a characteristic, or may pick up contaminants through their use that contributes to a hazardous characteristic.

As a final note, contaminated rags or commercial wipes regulated as hazardous waste **MAY NOT** be burned in a space heater, boiler, industrial furnace, incinerator, or other combustion device operated by the generator, or open burned. Such activities are very strictly regulated under RCRA and generally require a full Part B permit.

Please note that this is an instructional summary for compliance assistance purposes. Generators are encouraged to review the complete hazardous waste regulations and to check with appropriate DEQ staff if they have any questions about regulation applicability to their waste streams.

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Revision 6/13/01 (Orig. 2/14/94)